

431246

12-February-2002

Ms. Kristine Matzko (3HS23)
Remedial Project Manager
United States Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

RE: Lower Darby Creek Area Superfund Site

Dear Ms. Matzko:

Please find herein the response of Kimberly-Clark Corporation ("Kimberly-Clark") to the United States Environmental Protection Agency Region III's ("EPA") Request for Information pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §9607(a), for Lower Darby Creek Superfund Site, located in Delaware and Philadelphia Counties, Pennsylvania ("the Site"). Pursuant to the letter of Abraham Ferdas, dated January 25, 2002, received by Kimberly-Clark on February 5, 2002, this response is deemed timely filed.

As requested, we write to confirm Kimberly-Clark's willingness to participate in future discussions about this Site but must state that Kimberly-Clark responded to EPA's July 17, 2001 104(e) Request for Information on August 1, 2001 and thereafter submitted a Supplemental 104(e) response on October 17, 2001. Copies of both of these responses addressed to Carlyn Winter Prisk (3HS11) at EPA are attached hereto and made a part hereof. Both responses state that after diligent searches of records and interview of employees, no link was found between Kimberly-Clark and the Site nor the companies listed in Paragraph 8 of the 104(e) Request, or Eastern Industrial, for the time period 1965 through 1976. Kimberly-Clark has no knowledge of, nor participated in, any PRP Group with regard to this Site. Should you have any questions, please do not hesitate to call me.

Sincerely,



Marcia K. Cowan
Counsel

Attachments

Cc: (copy of letter only)
Tom Cosgrove
Rose Unser
[continued on next page]

Parties receiving copies of letter only:

Company	Address	Contact
The Boeing Company	P.O. Box 3707 Seattle, WA 98124-2207	Taralyn Trimpey, Counsel P.O. Box 516, Mail Code S100-3340 St Louis, MO 63166-0516
Browning-Ferris Industries, Inc.	c/o Allied Waste Systems, Inc. 15880 N. Greenway-Hayden Loop, Suite 200, Scottsdale, AZ 85260	Jeffrey N. Martin, Esq. Hunton & Williams 1900 K Street NW, Washington, DC 20006
Delaware County Solid Waste Authority	1521 North Providence Road Rose Tree Park, Hunt Club Building Media, PA 19063	Michael F.X. Gillen, Esq. Gillen & Associates 230 North Monroe Street, Media, PA 19063
E.I. duPont de Nemours and Company	1007 Market Street Wilmington, DE 19899	Pamela Meitner, Esq. DuPont Legal, D-7099 1007 Market Street, Wilmington, DE 19898
FMC Corporation	200 E. Randall Drive Chicago, IL 60601	John F. Stillmun, Assistant General Counsel 1735 Market Street, Philadelphia, PA 19103
General Electric Company	3135 Easton Turnpike Fairfield, CT 06413-0001	David Rifkind, Counsel-Environmental 640 Freedom Business Center King of Prussia, PA 19406
Wilbur C. Henderson, Jr.	c/o The Henderson Group 112 Chesley Drive, Suite 200 Media, PA 19063-1762	Norman C. Henss, General Counsel The Henderson Group 112 Chesley Dr., Suite 200 Media, PA 19063-1762
Henderson-Columbia Corporation	c/o The Henderson Group Wilbur C. Henderson, Jr. 112 Chesley Drive, Suite 200 Media, PA 19063-1762	Norman C. Henss, General Counsel The Henderson Group 112 Chesley Drive, Suite 200 Media, PA 19063-1762
Honeywell International, Inc.	101 Columbia Road Morristown, NJ 07962	David Cooke, Assistant General Counsel 101 Columbia Road, Morristown, NJ 07962
PECO Energy Company	c/o Exelon Corporation 37 th Floor, 10 S. Dearborn Street Post Office Box A-3005 Chicago, IL 60690-3005	H. Alfred Ryan, Assistant General Counsel Exelon Business Services Company 2301 Market Street (S23-1), P.O. Box 8699 Philadelphia, PA 19101
Rohm and Hass Company	100 Independence Mall West Philadelphia, PA 19106	Ellen S. Friedell, Associate General Counsel 100 Independence Mall West Philadelphia, PA 19106
United States Dept. of the Interior	Fish & Wildlife Services 1849 C. Street NW, Room 3012 Washington, DC 20240-0001	Mark Barash, Esq., Office of the Solicitor 1 Gateway Center, Suite 612 Newton, MA 02458
Waste Management, Inc.	100 Fannin Street, Suite 4000 Houston, TX 77002	Steve Joyce, Area Director 4 Liberty Lane West, Hampton, NH 03842 Joseph O'Dea, Esq., Saul Ewing Centre Square W. 1500 Market Street, 38 th Fl Philadelphia, PA 19102-2186
Chemical Leaman Tank Lines, Inc.	c/o Quality Distribution Inc. 3802 Corporex Park Drive Tampa, FL 33619	Louis Corrigan, Environmental Manager Quality Distribution Inc. 150 E. Pennsylvania Ave., Suite 125 Downingtown, PA 19335 Maxine Woelfling, Esq. Morgan Lewis & Bochi One Commence Square, 417 Walnut Street Harrisburg, PA 17101-1904
PPG Industries, Inc.	One PPG Place Pittsburgh, PA 15272	Paul M. King, Esq. PPG Industries, One PPG Place Pittsburgh, PA 15272



October 17, 2001

SENT CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Carlyn Winter Prisk (3HS11)
United States Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Lower Darby Creek Area Superfund Site
Clearview Landfill, Folcroft Landfill & Folcroft Landfill Annex
Delaware and Philadelphia Counties, Pennsylvania

Dear Ms. Prisk:

Kimberly-Clark Corporation ("Kimberly-Clark") hereby submits its Supplemental Response to the United States Environmental Protection Agency Region 3's ("EPA") Request for Information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), for Lower Darby Creek Area Superfund Site located in Delaware and Philadelphia Counties, Pennsylvania ("the Site").

Kimberly-Clark responded to your July 17, 2001 104(e) Request on August 1, 2001 after a diligent search of records and interview of employees. No link was found between Kimberly-Clark and the Site or to the companies listed in Paragraph 8 of the 104(e) request for the time period 1958 to 1976.

On August 24 you spoke to Susan Gaynor, a paralegal in our office, stating that additional information concerning an Eastern Industrial driver was inadvertently not included in your July 17 104(e) Request. You sent that information asking that we review and then supplement our August 1, 104(e) Response after review of this new data. On September 18 you again spoke with Susan clarifying some questions Kimberly-Clark had concerning the additional data you sent on August 24. Based on this information, a diligent search in response to EPA's requests was undertaken.

We send this Supplemental Response to inform EPA that a second diligent search of records and interview of employees was conducted. No link was found between Kimberly-Clark and the Site, the companies listed in Paragraph 8 of the 104(e) Request, or Eastern Industrial, for the time period 1965 through 1976. Should you have any questions, please do not hesitate to call me.

Sincerely,

Marcia K. Cowan
Counsel

cc: Tom Colgrove
Rose Unser

file

August 1, 2001

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ms. Carolyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Lower Darby Creek Area Superfund Site
Clearview Landfill, Folcroft Landfill & Folcroft Landfill Annex
Delaware and Philadelphia Counties, Pennsylvania

Dear Ms. Prisk:

Please find herein the response of Kimberly-Clark Corporation ("Kimberly-Clark") to the United States Environmental Protection Agency, Region III's ("EPA") Request for Information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), for Lower Darby Creek Area Superfund Site ("the Darby Site"). Pursuant to your letter dated July 17, 2001 received by Kimberly-Clark on July 23, 2001, this response is deemed timely filed.

Kimberly-Clark Corporation purchased Scott Paper Company ("Scott") in December 1995. Kimberly-Clark conducted a diligent search of all records and interviewed employees but no link was found between Kimberly-Clark/Scott to the Darby Site or to those companies listed in Paragraph 8 of the 104(e) request, specifically for the time period 1958 to 1976.

In 1990 Scott received a multi-site Directive under the NJ Spill Compensation and Control Act with regard to the Jonas Sewell Transfer Station ("the Jonas Site"). Scott voluntarily cooperated with other potentially responsible parties ("PRP") at the Jonas Site to comply with the Directive to perform a clean up. As there was no supporting documentation included in EPA's 104(e) Request For Information concerning the Darby Site, Kimberly-Clark is assuming that the nexus between Kimberly-Clark and the Darby Site arises out of Scott's status as a PRP at the Jonas Site. In the search of files related to the Jonas Site, the following documents were located and are included here for reference:

1. Copy of a letter (with attachments) dated August 1990 from Archer & Greiner to Scott providing the documentation linking Scott to the Jonas Site.
2. Copy of a letter (with attachments) dated May 1991 from Carpenter Bennett & Morrissey to Scott related to the Group Membership at the Jonas Site.
3. A copy of Scott's estimated allocation at the Jonas Site prepared for Peterson Consulting in June 1997.

As Kimberly-Clark was not the PRP at the Jonas Site but rather its predecessor, Scott, was the PRP at the Jonas Site, Kimberly-Clark must rely upon the files turned over by Scott when it completed the purchase in December 1995. Although Kimberly-Clark has no knowledge to the contrary, it is possible that the records concerning the Jonas Site may not be complete. Should Kimberly-Clark locate other responsive records related to the Jonas Site, Kimberly-Clark will submit a supplemental 104(e) response. Kimberly-Clark can find no nexus between any former Scott facility and the Darby Site. The Jonas Site files reveal information for the time period 1970 to 1980. The attached documents form Kimberly-Clark's entire response to EPA's 104(e) Request For Information with regard to the Site.

If you have any additional questions in regard to this matter, please feel free to contact me.

Sincerely,



Marcia K. Cowan

Attachments

Cc: Tom Colgrove
Ray VanEperen

Attachment 1

ARCHER & GREINER

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW
ONE CENTENNIAL SQUARE
P.O. BOX 3000
HADDONFIELD, N.J. 08033-0968
609 - 795-2121
FAX 609 - 795-0574

PHILADELPHIA OFFICE
SUITE 2200
TWO MELLON BANK CENTER
PHILADELPHIA, PENNSYLVANIA 19102
215 - 588-4106
FAX 215 - 588-2843

STUART M. ADDRESS*
LAUREN P. ALTERMAN
MARTYN S. BABITZ*
RICHARD B. COHN*
RICHARD J. D'AMICO*
TOMMIE ANN GIBNEY*
ELLEN M. GOERING*
JOHN H. HARTE, III
KURT P. HENJES*
THOMAS J. HURLEY
WILLIAM H. KENNEY
HELENE R. LEONE
ROBIN L. LITVAK*
REBECCA N. MANN
STEVEN K. MIGNOGNA*
THOMAS A. MUCCIFORI
RONALD J. PATTERSON*
SCOTT C. PYFER*
DEBRA S. ROSEN*
DEBORAH H. SIMON*

BETTY S. ADLER*
GEORGE J. ANDERSON*
ROBERT W. BUCKNAM, JR.*
JOHN C. CONNELL*
STEVEN J. FRAM*
CHRISTOPHER R. GIBSON*
JOHN C. GRADY*
DEBORAH A. HAYS*
REGINA A. HERMAN*
RICHARD S. ISRAEL*
DENISE M. KEYSER*
CARY A. LEVITT*
ROBERT J. MALLOY*
ELLIS I. MEDOWARY*
NANCY E. MILSTEN*
LEIF M. NISSEN*
SUSAN E. PENDERY*
NANCY M. RICE*
RICHARD F. ROY, JR.*

*Also Member of Pennsylvania Bar
*Member of Pennsylvania Bar Only

Direct Dial (609) 354-3077

THOMAS N. BANTVOGLIO
GEORGE F. KUGLER, JR.
PETER E. DRISCOLL
CHARLES W. HEUSLER
GEORGE N. NAGER*
ROBERT G. HARBESON
JOHN V. FIORELLA
ROBERT T. LEHMAN
ARTHUR F. RISDEN
JUMAN RUNNE*
FRANK R. DEMMERLY, JR.
ROBERT T. EGAN
STEVEN W. SURLAS*
GARY L. GREEN*
GERALD E. DARLING*
SEAN T. O'MEARA*

JOHN P. HAUCH, JR.
FREDERICK J. ROHLLOFF
CHARLES L. HARR, JR.
LEE M. HYMERLING
IRVING KOFLER*
ROBERT R. KUGLER*
EDWARD C. LAIRD
L. GERALD RIGBY*
THOMAS L. EARP
GARY J. LESNESKI
JAMES H. CARLL
FRANK D. ALLEN*
WILLIAM J. THOMPSON*
GORDON F. MOORE II*
TERENCE J. FOX

F. MORSE ARCHER, JR.
(1902-1984)

COUNSEL
FREDERICK P. GREINER

OF COUNSEL
JAMES P. MACLEAN, III

SPECIAL COUNSEL
PATRICIA K. WILLIAMS

August 2, 1990

RECEIVED
AUG 6 1990
LAW DIVISION

Frances Urso, Paralegal
Nicholas J. DeBenedictis, Esquire
Law Division
Scott Paper Company
Scott Plaza
Philadelphia, PA 19113

Re: Scott Paper - Connection with Marvin Jonas

Dear Ms. Urso:

As you requested, I am enclosing copies of the information we have potentially connecting Scott Paper with Marvin Jonas.

First, I am enclosing copies of miscellaneous ledgers maintained by Jonas for some customers. According to this record, between 1976 and 1980, transactions involving Scott Paper resulted in approximately \$13,000 of business for Marvin Jonas.

Next, I am enclosing copies of 3-ring binder ledgers maintained by Jonas on Scott Paper for approximately the same time period. According to this document, Jonas transported over 235 gallons of waste water, solids, still bottoms, paint and latex sludge and water emulsions to various disposal sites including the Knickerbocker Landfill in Malvern, Pa., the G.R.O.W.S. Landfill in Morrisville, Pa., and the Chem-Clear site in Chester, Pa.

One of the former Jonas drivers, Edward Sammacicci, testified with respect to Scott Paper as part of the GEMS litigation. I have enclosed a copy of the relevant portion of his deposition transcript for your review.

I hope this information will be helpful to you. If I can be of any further assistance, please feel free to call me at

Francis Urso, Paralegal
August 2, 1990
Page Two

any time.

Best regards.

Very truly yours,

ARCHER & GREINER
A Professional Corporation

BY: 

CHRISTOPHER R. GIBSON

CRG/dcl
Enclosures
A-47

Leath Payer - 1976 - Drums - 5000
 Alcolac per 35TS

Date	Container	Gallons	Line	Material	Temp.	Notes
4/15	37cu	1550	—	20-72	H	Knickerbocker
4/15	54cu	2700	10.5	20-71	H	Knickerbocker
4/15	19cu	950	38	20-71	H	Knickerbocker
4/15	64cu	3200	—	20-72	H	Knickerbocker
5/10	18cu	900	36	20-72	H	Knickerbocker
5/10	33cu	1650	—	20-72	H	Knickerbocker
5/10	29cu	1450	5.5	20-71	H	Knickerbocker
11/15	68cu	3400	—	20-72	H	Knickerbocker
11/15	22cu	1,100	4.4	20-71	H	Knickerbocker
		10,100 gals	20-72	Water	H	Knickerbocker
28.4		2,100 gals	20-71	Solids	H	Knickerbocker

		(NO)	1977			
6/30/77	80 cu	4,000	1977	20-72	H	Knickerbocker
10/10	72	6,500		20-72	H	Knickerbocker
10/17	72	5,000		20-72	H	Knickerbocker
11/28	72	5,500		20-72	H	Knickerbocker
11/30	72	5,500		20-72	H	Knickerbocker
12/12	72	11,000		20-72	H	Knickerbocker
14/19	72	5,500		20-72	H	Knickerbocker

49,000

gals.

20-72 Water

H Knickerbocker - 4,000

X GROWS - 39,000 ✓

39,500

Scott Paper Co.

1978

NO for anything

Date	Cont.	Gallons	Material	Disposal Site
1/23	tw	5,500	20-72 water	grows Chem clear
2/20	tw	5,500	20-72 water	grows
3/27	tw	11,000	20-72 water	Chem clear
3/27	tw	17,500	20-72 water	grows
4/11	tw	6,500	20-72 water	Chem clear
4/11	tw	11,500	20-72 water	grows
4/17	tw	6,000	20-72 water	Chem clear
5/15	tw	11,000	20-72 water	Chem clear
6/12	tw	5,500	20-72 water	chem clear
7/10	tw	11,300	15-72 water emulsion	Chem clear
7/24	tw	11,500	15-72 water emulsion	Chem clear
7/31	tw	5,500	15-72 water emulsion	Chem clear
8/14	tw	13,500	paper + Emulsion	Chem clear
8/21	88 DR.	22 cu yds	Sludge 20-72	Knickeebocker
9/1	1 tw	5,500	Water	Chem clear
9/18	1 tw	5,500	Emulsion	Chem clear
9/25	42	10 1/2 cu yds	11-72 LATEX Sludge	Knickeebocker
10/9	1 tw	5,500 gals.	LATEX WATER	Chem clear
11/20	1 tw	5,500 gal.	Latex	G. R. O. W. S.
12/18	2 tw	11,000 gal.	Emulsion	Chem clear
1979				
1/2/79	2 tw	11,100 gal.	20-72 Water	chem clear
1/2/79	2 tw	11,750 gal.	20-72 Water	chem clear
1/2/79	94 DR.	23 1/2 cu yds	Paint Sludge	Knickeebocker
		20-72 Water	73,350 gals.	Chem clear
		15-72 Water	34,500 gals.	grows
		55,800 gal.		Chem clear

NAME
ADDRESS
CITY

5 " Music 1976 WASTE

BALANCE FORWARD →

DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
3-1	158	STONE HARBOR 4493	250 -		250 -	
3-8	S-60	STATE WIDE 7532	399 -		649 -	
3-23	R52	7493		250 -	399 -	
4/13	S-64	SCOTT PAPER CO 7682	682 50		1,081 50	
4/19	S-65	SCOTT PAPER CO 7714	622 50		1,704 00	
4/23	R56	STATE WIDE 7532		399 00	1,305 00	
4/26	S-67	STATE WIDE 7758	385 00		1,690 00	
4/30	R-57	SCOTT 7682		682 50	1,007 50	
5/10	S-70	SCOTT 7820	600 00		1,607 50	
5/24	R60	SCOTT 7714		622 50	985 00	
6/21	S76	STAUFFER Chem. 8027	2647 50		3632 50	
6/28	S77	STAUFFER 8054	1597 50		5230 00	
7/2	R65	SCOTT 7820		600 00	4630 00	
7/30	R68	STAUFFER 8027		2647 50	1982 50	
7/30	R68	STAUFFER 8054		1,597 50	385 00	
8/9	S83	STAUFFER 8242	862 50		1247 50	
8/20	R70	STATE WIDE 7758		385 00	862 50	
8/31	S87	STAUFFER 8331	1042 50		1905 00	
9/17	R73	STAUFFER 8242		862 50	1042 50	
9/27	S90	STAUFFER 8460	757 50		1800 00	
10/8	R76	STAUFFER 8331		1042 50	257 50	
10/11	S93	STAUFFER 8529	937 50		1695 00	
10/18	S-94	SOMMERSET TAX 8550	180 00		1875 00	
10/25	S-96	SOMMERSET TAX 8588	354 00		2229 00	
10/29	R78	SOMMERSET TAX 8510		180 00	2049 00	



SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-7

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

NAME
ADDRESS
CITY

"S" Music

WASTE

BALANCE FORWARD → 2049 00

DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
10/30	S-97	Somerset 8630	699 00		2748 00	2049 00
11/5	R-19	simmeract 8550-8630		1053 00	1695 00	2748 00
11/5	R-79	Stauffer 8460		757 50	937 50	1695 00
11/8	S-99	Stauffer 8666	1012 50		1950 00	937 50
11/19	R-82	8529		937 50	1012 50	1950 00
11/15	S-100	8693	675 00		1687 50	1012 50
12/10	R-83	Somerset 8693		195 00	1492 50	1687 50
12/17	R-84	8693		675 00	817 50	1492 50
12/17	R-84	8666		1012 50	(195 00)	817 50
			1977			
1/19/77	S-5	Somerset	195 00		- 0 -	(195 00)
1/24/77	S-5	STROTHERS DUBOIS 157	100 00		100 00	- 0 -
2/4/77	OK-3	157		100 00	- 0 -	100 00
6/30	S-33	931 Scott	800 00		800 00	- 0 -
6/30	S-33	932 Sherman	810 00		1610 00	800 00
7/15	R-82	932		810 00	800 00	1610 00
8/26	R-28	931		800 00	- 0 -	800 00
9/26	S-49	1345 Shaw	930 00		930 00	- 0 -
10/7	R-33	1345		930 00	- 0 -	930 00
10/10	S-52	1432	650 00		650 00	- 0 -
10/18	S-54	1465	500 00		1150 00	650 00
11/13	R-38	1432		650 00	500 00	1150 00
11/25	R-34	1465		500 00	- 0 -	500 00
11/29	S-61	1655 Scott	550 00		550 00	- 0 -
11/30	S-62	1676	550 00		1100 00	550 00

NAME
ADDRESS
CITY

5 Misc

BALANCE FORWARD →

1100 00

	DATE	FOLIO	DETAIL		DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	12/12	S63	1721	2	550 00		1650 00	1100 00
2	12/12	S63	1720	3	550 00		2200 00	1650 00
3	12/12	S63	1742	6	1700 00		3900 00	2200 00
4	12/19	S64	1763	3	550 00		4450 00	3900 00
5	12/26	R43	1742	6		1700 00	2750 00	4450 00
6					1978			
7	1/1	S1	1824	2	1140 00		3890 00	2750 00
8	1/6	R-1	1676-1655	1		1100 00	2790 00	3890 00
9	1/20	R3	1720	2	550 00	550 00	2240 00	2790 00
10	1/20	R3	1721	3	550 00	550 00	1690 00	2240 00
11	1/20	R.3	1824	2		1140 00	550 00	1690 00
12	1/23	S.4	1897	1	550 00		1100 00	550 00
13	1/27	R.3	1763	7		550 00	1550 00	1100 00
14	2/20	S8	2020	5	550 00		1100 00	550 00
15	2/20	S8	2020		550 00	550 00	2200 00	1100 00
16	3/10	R.9	1897	1		550 00	550 00	1100 00
17	3/17	R.10	2020	1		550 00	- - -	550 00
18	3/27	S14	2193	1	3290 00		3290 00	- - -
19	4/1	S16	2219	1	2,060 00		5,350 00	3290 00
20	4/10	S-17	2259 ^{Shrout}	1	800 00		6150 00	5,350 00
21	4/17	S-18	2293	1	840 00		6990 00	6150 00
22	4/24	S-19	2308	1	550 00		7540 00	6990 00
23	4/28	R-15	2259	6		800 00	6740 00	7540 00
24	5/5	R.16	2193-2219	1		5350 00	1390 00	6740 00
25	5/15	S 22	2430 ^{See 11}	1	1430 00		2820 00	1390 00

NAME
ADDRESS
CITY

15

BALANCE FORWARD →

2820 00

	DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	5/19	R-18	2293		840 00	1980 00	2820 00
2	5/22	R-19	2308		550 00	1430 00	1980 00
3	5/31	S-25	2499	1820 00		3250 00	1430 00
4	6/12	S-27	2545 Scott	715 00		3965 00	3250 00
5	6/12	S-27	2546 Skrwini	800 00		4765 00	3965 00
6	6/16	R-22	2499		1820 00	2945 00	4765 00
7	6/23	R-23	2430		1430 00	1515 00	2945 00
8	6/23	R-23	2546		800 00	715 00	1515 00
9	7/10	S-32	258 8371	464 00		1179 00	715 00
10	7/10	S-32	2702	1469 00		2489 00	1179 00
11							2489 00
12	7/14	R-26	2545		715 00	1469 00	2489 00
13	7/24	S-33	2731	1495 00		2964 00	1469 00
14	7/24	S-33	2743	3612 00		6576 00	2964 00
15	7/26	R-27	2702		1469 00	5107 00	6576 00
16	7/31	S-35	2761	715 00		5822 00	5107 00
17	7/31	S-35	2763	1200 00		7022 00	5822 00
18	7/31	S-35	2762	1204 00		8226 00	7022 00
19	8/7	S-36	2816	1700 00		9926 00	8226 00
20	8/11	R-30	2763-2816		2900 00	7026 00	9926 00
21	8/14	S-37	2840	1430 00		8456 00	7026 00
22	8/21	S-38	2731		1495 00	6961 00	8456 00
23	8/22	S-38	2888	884 00		7845 00	6961 00
24	8/22	S-39	2882	1628 00		9473 00	7845 00
25	8/30	S-39	0597	715 00		10188 00	9473 00

NAME
ADDRESS
CITY

S

WISSE

BALANCE FORWARD →

10188 00

	DATE	FOLO	DETAIL	DEBIT	CREDIT	BALANCE	REV. OLD BALANCE
1	8/3	R33	2761-2840		2145 00	8043 00	10188 00
2	8/3	R33	2743		3612 00	4431 00	8043 00
3	8/3	R33	2767		1204 00	3227 00	4431 00
4	9/8	R34	2838		884 00	2343 00	3227 00
5	9/18	S-43	8826	715 00		3058 00	2343 00
6	9/22	R36	2832		1628 00	1430 00	3058 00
7	9/25	S-44	8778 ^{serv. fee}	1800 00		3230 00	1430 00
8	9/25	S-45	8777 ^{scott}	777 00		4007 00	3230 00
9	9/29	R-37	8778		1800 00	2207 00	4007 00
10	10/1	R38	5978326		1430 00	777 00	2207 00
11	10/9	S-48	8736	715 00		1492 00	777 00
12	10/13	R39	8777		722 00	715 00	1492 00
13	10/30	R41	8736		715 00	- 0 -	715 00
14	11/20	S-54	1160	850 00		850 00	- 0 -
15	11/20	S-54	1161	1230 00		2080 00	850 00
16	11/20	S-54	1162	1892 00		3972 00	2080 00
17	11/30	R44	1161		1230 00	2742 00	3972 00
18	12/11	S-56	1212	1892 00		4634 00	2742 00
19	12/11	S-56	1227	100 00		4734 00	4634 00
20	12/22	S-57	1243	1430 00		6164 00	4734 00
21	12/30	S-56	1227		100 00	6064 00	6164 00
22							
23							
24	1/4/79	R-1	1162		1892 00	4172 00	6064 00
25	1/7/79	R-1	1243		1430 00	2742 00	4172 00

1979

NAME
ADDRESS
CITY

S

WASTE

BALANCE FORWARD →

2742.00

	DATE	FOLIO	DETAIL	✓	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	1/2/79	S-2	1279	✓	435.00		3177.00	2742.00
2	1/2/79	S-2	1249	✓	1443.00		4620.00	3177.00
3	1/2/79	S-2	1277	✓	1527.50		6147.50	4620.00
4	1/2/79	S-2	1278	✓	1739.00		7886.50	6147.50
5	1/15/79	S-3	1312	✓	520.00		8406.50	7886.50
6	1/19	R-2	1160	✓		850.00	7556.50	8406.50
7	1/19	R-2	1249	✓		1443.00	6113.50	7556.50
8	4/29	S-4	1363	✓	650.00		6763.50	6113.50
9	1/26	R-3	1277	✓		1527.50	5236.00	6763.50
10	1/26	R-3	1278	✓		1739.00	3497.00	5236.00
11	1/26	R-3	1218	✓		1892.00	1605.00	3497.00
12	2/9/79	R-4	1363	✓		650.00	955.00	1605.00
13	2/9/79	R-4	1279	✓		435.00	520.00	955.00
14	2/20/79	R-5	1312	✓		520.00	-0-	520.00
15	2/26	S-7	1435	✓	2223.00		2223.00	-0-
16	2/26	S-7	1436	✓	1581.00		3804.00	2223.00
17	2/26	S-7	1438	✓	935.00		4739.00	3804.00
18	3/12	S-9	1490	✓	2860.00		7599.00	4739.00
19	3/27	R-8	1438	✓		935.00	6664.00	7599.00
20	3/30	R-9	1435	✓		2223.00	4441.00	6664.00
21	4/4	R-10	1490	✓		2860.00	1581.00	4441.00
22	4/12	S-12	1576	✓	1430.00		3011.00	1581.00
23	4/9	S-12	1578	✓	1892.00		4903.00	3011.00
24	4/27	R-12	1576	✓		1430.00	3473.00	4903.00
25	4/30	S-15	1688	✓	1912.50		5385.50	3473.00



SAFEGUARD BUSINESS SYSTEMS
LANSDALE, PA LOS ANGELES, CHICAGO, ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-7

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

NAME
ADDRESS
CITY

"S"

JSTS - Aug. 1979

BALANCE FORWARD →

5385 50

	DATE	FOLIO	DETAIL	✓	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	4/30	S-16	1687	✓	715 00		6100 50	5385 50
2	5/10	R-14	1578	✓		1892 00	4208 50	6100 50
3	5/18	R-15	1687	✓		715 00	3493 50	4208 50
4	5/21	R-15	1688	✓		1912 50	1581 00	3493 50
5	5/22	S-19	1780	✓	1887 00		3468 00	1581 00
6	6/4	R-17	1436	✓		1581 00	1887 00	3468 00
7	5/31	S-21	1825	✓	1430 00		3317 00	1887 00
8	5/31	S-21	1826	✓	900 00		4217 00	3317 00
9	5/31	S-21	1828	✓	1892 00		6109 00	4217 00
10	6/4	R-17	1900	✓		2024 00	4085 00	6109 00
11	6/4	R-18	1826	✓		900 00	5209 00	6109 00
12	6/11	S-22	1864	✓	1092 00		6301 00	5209 00
13	6/14	R-18	1780	✓		1887 00	4414 00	6301 00
14	6/14	R-18	1825	✓		1430 00	2984 00	4414 00
15	6/18	S-23	1900	✓	2000 00		4984 00	2984 00
16	6/20	R-19	1828	✓		1892 00	3092 00	4984 00
17	6/25	S-24	1922 ^{Scott}	✓	1848 00		4940 00	3092 00
18	6/30	S-25	1962 ^{Scott}	✓	715 00		5655 00	4940 00
19	7/9	S-27	1994 ^{Scott}	✓	741 00		6396 00	5655 00
20	7/13	R-22	1900	✓		2000 00	4396 00	6396 00
21	7/13	R-22	1864	✓		1092 00	3304 00	4396 00
22	7/23	S-29	2034 ^{Scott}	✓	741 00		4045 00	3304 00
23	7/27	R-24	1922 62 ^{Scott}	✓		2563 00	1488 00	4045 00
24	8/8	R-25	1994 ^{Scott}	✓		741 00	741 00	1488 00
25	9/18	S-38	2302 ^{Second Hand}	✓	285 00		1026 00	741 00

SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-7

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

NAME
ADDRESS
CITY

BALANCE FORWARD →

10.26 00

	DATE	FOLIO	DETAIL	✓	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	9/18	S-38	2303	✓	1430 00		2456 00	10.26 00
2	9/25	R-31	2302	✓		285 00	2171 00	2456 00
3	9/30	S-40	2367	✓	715 00		2886 00	2171 00
4	10/19	R-35	2367-2303	✓		2145 00	741 00	2886 00
5	11/14	S-46	2496 ^{Scot}	✓	1545 00		2286 00	741 00
6	11/19	S-47	2518	✓	715 00		3001 00	2286 00
7	12/27	R-41	2496 ^{Scot}	✓	559 00	1545 00	1456 00	3001 00
8					1980			
9	11/4/20	R-1	2518	✓		715 00	741 00	1456 00
10	1/9	S-1	2617 ^{Scot}	✓	741 00		1482 00	741 00
11	1/14	R-2	2635	✓	2464 00		3946 00	1482 00
12	1/22	S-2	2657 ^{Scot}	✓	1320 00		5266 00	3946 00
13	1/28	R-2	2635	✓		2464 00	2802 00	5266 00
14	1/8	S-3	2675	✓	1430 00		4232 00	2802 00
15	1/30	R-3	2657	✓		1320 00	2912 00	4232 00
16	2/19	R-5	2617	✓		741 00	2171 00	2912 00
17	2/28	R-7	2675	✓		1430 00	741 00	2171 00
18	6/17	S-16	3046 ^{Scot}	✓	875 00		1616 00	741 00
19	6/20	R-19	3046	✓		875 00	741 00	1616 00
20	6/23	S-17	3063 ^{Scot}	✓	18593 75	✓	19,334 75	741 00
21	6/30	S-18	3076 ^{Scot}	✓	800 00		20,134 75	19,334 75
22	6/30	S-18	3077 ^{Scot}	✓	29531 25	✓	49,666 00	20,134 75
23	7/15	R-22	3076	✓		800 00	48,866 00	49,666 00
24	7/14	S-19	3106 ^{Scot}	✓	800 00		47,666 00	48,866 00
25	7/14	S-19	3107 ^{Scot}	✓	3128 25	✓	48,384 75	47,666 00

SAFEGUARD BUSINESS SYSTEMS
LANSDALE PA LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-1

P-31

1

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CIVIL ACTION NO. 84-0152

x-----x

STATE OF NEW JERSEY,
DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

CIVIL ACTION

DEPOSITIONS

Plaintiff,
-vs-

OF
THOMAS A. ILES
PAUL GOHAGAN
EDWARD SAMMACICCI

GLOUCESTER ENVIRONMENTAL
MANAGEMENT SERVICES, INC.,
ANTHONY AMADEI, individually,
DAVID EHRLICH, individually,
and RICHARD WINN, individually,
Defendants,

5/17/87

AND

GLOUCESTER ENVIRONMENTAL
MANAGEMENT SERVICES, INC.,
ANTHONY AMADEI, individually,
DAVID EHRLICH, individually,
and RICHARD WINN, individually,
Third-Party Plaintiffs,
-vs-

TOWNSHIP OF GLOUCESTER,
Third-Party Defendant,

AND

TOWNSHIP OF GLOUCESTER,
Fourth-Party Plaintiffs,
-vs-

CITY and COUNTY OF PHILADELPHIA,
GEPPERT BROTHERS, INC., and
CURTIS T. BEDWELL & SONS, INC.,
Fourth-Party Defendants,

AND

CURTIS T. BEDWELL & SONS, INC.,
Fifth-Party Plaintiff,
-vs-

INSURANCE COMPANY OF NORTH AMERICA,
Fifth-Party Defendants.

x-----x

RECEIVED

APR 27 1989

93-61384

ARCHER & GREINER
A PROFESSIONAL CORPORATION

STATE SHORTHAND REPORTING SERVICE, INC.

1 A. I don't know.

2 Q. Do you know if anybody from Marvin's
3 outfit was hauling for Exxon?

4 A. I don't know.

5 Q. How about Devoe and Reynolds Company;
6 do you remember them?

7 A. No.

8 Q. Do you remember hauling for SCM
9 Corporation?

10 A. No. I don't remember, no.

11 Q. Do you remember an outfit called
12 Fred Heinzelmann and Sons?

13 A. No. I don't remember.

14 Q. How about Scott Paper Company in
15 Chester?

16 A. Scott Paper, yeah.

17 Q. Where was their stuff taken?

18 A. G.R.O.W.S.

19 Q. Do you know what it was?

20 A. Not offhand, no.

21 Q. How about U.S. Steel?

22 A. No.

23 Q. Don't remember ever hauling for them?

24 A. No.

25 Q. Have you ever heard of the outfit

Attachment 2

CARPENTER, BENNETT & MORRISSEY

JAMES D. CARPENTER (1909-1972)

THOMAS L. MORRISSEY
WARREN LLOYD LEWIS
LAURENCE REICH
STANLEY WEISS
JOHN C. HEAVEY
JOHN E. KEALE
EDWARD F. RYAN
JAMES J. CROWLEY, JR.
JOHN P. DWYER
DAVID M. McCANN
MICHAEL S. WATERS
ANTHONY C. FAMULARI
JAMES G. GARDNER
JOHN F. LYNCH, JR.
FRANCIS X. O'BRIEN
DONALD A. ROMANO
ROBERT E. TURTZ
FRANCIS X. DEE

RUDY B. COLEMAN
EDWARD F. DAY, JR.
JEROME E. SHARFMAN
IRVING L. HURWITZ
ROSEMARY ALITO
EDWIN R. ALLEY
ROSEMARY J. BRUNO
WILLIAM A. CARPENTER, JR.
JOHN J. PEIRANO
LINDA B. CELAURO
JOHN D. GOLDSMITH
THOMAS J. LENNON
JOHN K. BENNETT
PATRICK G. BRADY
LOUIS M. D'ESTEFANO
MICHAEL J. GREENWOOD
THOMAS F. MCGUANE
JOSEPH D. RASNEK
ROBERT J. STICKLES

LAW OFFICES
THREE GATEWAY CENTER
100 MULBERRY STREET
NEWARK, NJ 07102-4082

TELEPHONES
(201) 622-7711
(212) 943-6530

TELECOPIER
(201) 622-5314

TELEX
139405

WRITER'S DIRECT DIAL NO.
(201) 565-

ELMER J. BENNETT, OF COUNSEL
ARTHUR M. LIZZA, OF COUNSEL
ALEXANDER COHEN, SPECIAL COUNSEL
MEMBER OF NY AND PA BARS ONLY

May 10, 1991

*Noted
5/14/91
J. Keenan
J. Lynch*

Fran Urso, Esq.
Scott Paper Company
Scott Plaza Two
Philadelphia, PA 19113

Re: Jonas Transfer Site (JSTS)

Dear Ms. Urso:

As per your request, enclosed please find copies of the Jonas Transfer Station material related to the Group membership. Please call if you have questions or further requests.

Sincerely,

Jim Keenan
Jim Keenan

Enc.

CARPENTER, BENNETT & MORRISSEY

LAW OFFICES
THREE GATEWAY CENTER
100 MULBERRY STREET
NEWARK, NJ 07102-4082

TELEPHONES
(201) 622-7711
(212) 943-6530

TELECOPIER
(201) 622-5314

TELEX
139405

JAMES D. CARPENTER (1909-1972)

THOMAS L. MORRISSEY	JEROME E. SHARFMAN
WARREN LLOYD LEWIS	IRVING L. HURWITZ
LAURENCE REICH	ROSEMARY ALITO
STANLEY WEISS	EDWIN R. ALLEY
JOHN C. HEAVEY	ROSEMARY J. BRUNO
JOHN E. KEALE	WILLIAM A. CARPENTER, JR.
EDWARD F. RYAN	JOHN J. PEIRANO
JAMES J. CROWLEY, JR.	LINDA B. CELAURO
JOHN P. DWYER	JOHN D. GOLDSMITH
DAVID M. MCCANN	THOMAS J. LENNON
MICHAEL S. WATERS	JOHN R. BENNETT
ANTHONY C. FAHULARI	PATRICK G. BRADY
JAMES G. GARDNER	LOUIS M. DESTEFANO
JOHN F. LYNCH, JR.	MICHAEL J. GREENWOOD
FRANCIS X. O'BRIEN	THOMAS F. MCGUANE
DONALD A. ROMANO	JOSEPH D. RASNEK
FRANCIS X. DEE	ROBERT J. STICKLES
RUDY B. COLEMAN	ROBERT M. GOODMAN
EDWARD F. DAY, JR.	SILVIO J. DE CARLI

ELMER J. BENNETT, OF COUNSEL
ARTHUR M. LIZZA, OF COUNSEL

ALEXANDER COHEN, SPECIAL COUNSEL
MEMBER OF NY AND PA BARS ONLY

FRANCIS X. FERRARA
CATHERINE ROMANIA MATTERA
GLENN P. CORBETT
KEVIN P. DUFFY
LYNN D. HEALY
THOMAS M. MOORE
JANE ANDREWS LALLI
SCOTT J. SHELDOON
JOHN M. MARMORA
JANE A. RIGBY
JAMES E. PATTERSON
JOEL L. BOTWICK
STEPHEN F. PAYERLE
JENNIFER L. KAPPELL
KEVIN C. DONOVAN
ROBERT L. MEUGLE, JR.
JAMES P. LIDON
HANS G. POLAK

DOMINICK BRATTI
I. MICHAEL KESSEL
LOIS M. GOODMAN
DOUGLAS H. AMSTER
LANNY R. ALEXANDER
VIRGINIA OBER
DAVID J. REILLY
DENNIS M. HELEWA
JOHN J. SHEA
DOUGLAS S. WITTE
MICHELLE HYDRUSKO
JEFFREY BERNSTEIN
MATTHEW J. BOYLAN
KEVIN F. MURPHY
ELIZABETH A. HUTTON
BARRY GERSTEIN
JOSEPH G. LEE
M. CLAIRE McLAUGHLIN
ALLISON NAGELBERG

March 27, 1991

TO: JSTS RESPONDENTS WHO HAVE NOT JOINED THE GROUP

Please accept this letter as a final invitation to you as one of the PRP's who have not yet elected to participate in the Group. I have been asked to urge you to join the Group in time to participate in the reallocation process. As you know, the Group is attempting to provide its members with a reasonable mechanism for allocating the costs of the various activities required by the State at this Site. To date those activities have led to costs of approximately \$1,400,000. The costs of the work which the State may order in the future may be in the \$6,000,000 range or more.

You should be aware that those parties which decline to join the Group and cooperate with the other members in bearing the cost of the work may face exposure to additional costs and penalties. I have been directed to meet with John MacDonald of the NJDEP to discuss the status of this matter, including the possibility of the issuance of a second Directive. This meeting is scheduled for April 8, 1991.

The non-participants who are issued a second Directive will face risks of higher penalties for non-compliance due to recent changes in the law. For example, one section of the Spill Act, N.J.S.A. 58:10-23.11u, now carries a \$50,000 per day penalty for refusal to comply with a DEP Directive. Furthermore, as you are probably aware, the State Legislature is moving toward final approval of legislation (A-3659/S-2657) establishing an express private right of action for PRP's to pursue other PRP's who fail to enter into an agreement with the NJDEP to comply with a Directive to remove or arrange for the removal of hazardous

JSTS Non-participating Respondents
March 27, 1991
Page 2

substances. This legislation also provides settling parties to be subrogated to the State's right to collect treble damages from any defendant who has failed or refused to comply with any Directive, and who is subject to a contribution action under the Spill Act.

So, it may also be that future phases of work at this site will be the subject of future directives for which \$50,000 a day penalties and treble damages, which may be subrogated, pertain. You may feel the pressures of those new factors when you receive that directive. It is likely you will be better able to respond then if you participate in the Group and its allocation procedures now.

In a conference call on March 18, the Steering Committee decided that those parties which do not participate in the Group during the reallocation process will not receive the information being generated. The summaries being prepared of the opening statements submitted by Group members to the allocation consultant are not being circulated to PRP's outside of the Group.

The Steering Committee also decided to extend the deadline for Group members to submit opening statements to Peterson Consulting to Tuesday, April 23. This extension has the collateral benefit of providing those of you who have not joined the Group with the additional time necessary to join and prepare an opening statement for submission to the allocation consultant.

The Steering Committee asks that you promptly and seriously consider joining the Group and participating in the allocation process. In previous letters, you received a copy of the Group Agreement, a copy of the allocation consultant's contract, and an invoice for the assessment to be paid in order to participate in the Group. If you do not have a copy of the agreement and this invoice, please contact Jim Keenan of our office for a second copy. Checks should be made payable to the "Jonas Transfer Station Respondents Fund" and mailed to me in the envelope provided for that purpose.

If you have any questions about this Site or the process outlined in this letter, please contact me. If I am not available, please ask for Patrick McNamara, who is the associate assisting me

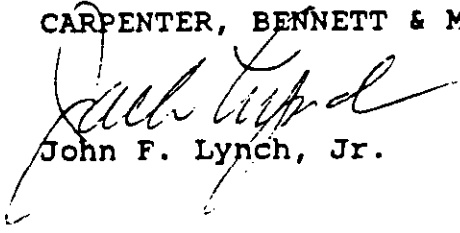
CARPENTER, BENNETT & MORRISSEY

JSTS Non-participating Respondents
March 27, 1991
Page 3

with this matter. Of course, my secretary Doreen Schettino and our paralegal Jim Keenan remain available to answer questions about organizational and factual matters.

Very truly yours,

CARPENTER, BENNETT & MORRISSEY



John F. Lynch, Jr.

JFL/sa

cc: All JSTS Group Members
Peterson Consulting

Attachment 3

Attached is the Peterson Consulting document to verify the numbers with regard to Scott Paper. The total gallons for 1976, 1977, 1978 drums and 1976, 1977, 1978 tankers came from the handwritten Marvin Jonas documents. Attached is a copy of the handwritten pages which Peterson Consulting used to determine the drum and tanker numbers. For the years 1979 and 1980 Peterson Consulting used the Jonas accounts receivable ledger.

JONAS SEWELL TRANSFER STATION
ESTIMATED GALLONS
MEMBER: SCOTT PAPER CO.

06/17/92

ACCOUNTS RECEIVABLE & THREE RING BINDER:

YEAR	DRUMS			TANKER		
	DEBIT	DRUMS	\$/GALLON	DEBIT	TANKER	GALLONS
1970	\$0		0.05	\$0		0
1971	0	0	0.06	0	0	0
1972	0	0	0.08	0	0	0
1973	0	0	0.11	0	0	0
1974	0	0	0.14	0	0	0
1975	0	0	0.16	0	0	0
1976	0	0	N/A	0	0	0
1977	0	0	N/A	0	0	0
1978	0	0	N/A	0	0	0
1979	5,590	1,230 [1]	0.42	5,590	4,360 [2]	39,000 [4]
1980	741	163 [1]	0.63	741	578 [2]	152,300 [4]
UNKNOWN	0	0	0.29	0	0	33,540 [3]
TOTAL	\$6,331	\$1,393		\$6,331	\$4,938	3,211 [3]
						228,051

OTHER SOURCES:

TOTAL ALL SOURCES 30,950

- [1] USING THE THREE RING BINDER DATA, WE CALCULATED THAT 22% OF THE SCOTT PAPER CO. WASTE HAULED BY JONAS WAS IN DRUMS. THIS PERCENTAGE WAS APPLIED TO THE TOTAL ACCOUNTS RECEIVABLE DOLLARS FOR THIS YEAR TO DETERMINE THE TRANSACTIONS RELATED TO DRUM WASTE.
- [2] USING THE THREE RING BINDER DATA, WE CALCULATED THAT 78% OF THE SCOTT PAPER CO. WASTE HAULED BY JONAS WAS IN TANKER. THIS PERCENTAGE WAS APPLIED TO THE TOTAL ACCOUNTS RECEIVABLE DOLLARS FOR THIS YEAR TO DETERMINE THE TRANSACTIONS RELATED TO TANKER WASTE.

[3] SOURCE: ACCOUNTS RECEIVABLE LEDGERS.

[4] SOURCE: THREE RING BINDER.

PRIVILEGED AND CONFIDENTIAL

PETERSON CONSULTING L.P.

1976 - Dumps per

Date	Container	Gals	1976	1977	Notes
4/13	37dc	1850	—	20 72	#
4/13	37dc	2700	10.5	20 72	#
4/15	19dc	950	3.5	20 72	#
4/15	64dc	3200	—	20 72	#
5/10	18dc	900	3.6	20 72	#
5/10	33dc	1650	—	20 72	#
5/10	29dc	1450	5.5	20 72	#
11/15	68dc	3400	—	20 72	#
11/15	22dc	1,100	4.4	20 72	#
		10,100	gals	20 72	Water
		28.4	gals	21 71	Solids

		(NO)	1977		
6/30/77	80 dc	4,000	1977	20 72	#
10/10	tw	6,500		water	✓
10/17	tw	5,000		20 72	✓
11/27	tw	5,500		water	✓
11/30	tw	5,500		20 72	✓
12/12	tw	11,000		water	✓
14/19	tw	5,500		20 72	✓
		49,000	gals	20 72	Water
				H	Knickerbockers - 4,000
					X GROWS - 39,000 ✓

39,500 -

NO for any Hilly

Date	Cont.	Gallons	Material	Disposal Site
1/23	tw	5,500	20-72 water	grows Chem clear
2/20	tw	5,500	20-72 water	grows
3/27	tw	11,000	20-72 water	Chem clear
3/21	tw	17,500	20-72 water	grows
4/1	tw	6,500	20-72 water	Chem clear
4/1	tw	11,500	20-72 water	grows
4/1	tw	6,000	20-72 water	Chem clear
5/15	tw	11,000	20-72 water	Chem clear
6/12	tw	5,500	20-72 water	chem clear
7/10	tw	11,800	15-72 water emulsion	Chem clear
7/24	tw	11,500	15-72 water emulsion	Chem clear
7/31	tw	5,500	15-72 water emulsion	Chem clear
8/14	tw	18,500	PAPER-EMULSION	Chem clear
8/21	88 DR.	22 cu yds	Sludge 20-72	Knickerbocker
9/1	1 tw	5,500	Water	Chem clear
9/18	1 tw	5,500	Emulsion 11-72	Chem clear
9/25	42	10 1/2 cu yds	LATEX Sludge 11-72	Knickerbocker
10/9	1 tw	5,500 gal.	LATEX WATER	Chem clear
11/20	1 tw	5,500 gal.	LATEX	G.R.O.W.S.
12/18	2 tw	11,000 gal.	Emulsion	Chem clear

1478

1979				
1/2/79	2 tw	11,100 gal.	20-72 water	chem clear
1/2/79	2 tw	11,750 gal.	20-72 water	chem clear
1/3/79	94 DR.	23 1/2 cu yds	Paint Sludge	Knickerbocker
		20-72 Water	23,850 gals.	Chem clear
		15-72 water	4,500 gals.	grows
		27-72 water	55,800 gals.	Chem clear

ADDRESS
CITY

5
JSTS - July 1979

BALANCE FORWARD →

5385 50

	DATE	FOLIO	DETAIL	✓	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	4/30	S-16	1687	✓	715 00		6100 50	5385 50
2	5/10	R-14	1578	✓		1892 00	4208 50	6100 50
3	5/18	R-15	1687	✓		715 00	3493 50	4208 50
4	5/22	R-15	1688	✓		1912 50	1581 00	3493 50
5	5/22	S-19	1780	✓	1887 00		3468 00	1581 00
6	6/4	R-17	1436	✓		1581 00	1887 00	3468 00
7	5/31	S-21	1825	✓	1430 00		3317 00	1887 00
8	5/31	S-21	1826	✓	900 00		4217 00	3317 00
9	5/31	S-21	1828	✓	1892 00		6109 00	4217 00
10	6/4	R-18	1826	✓	900 00	2024 00	5209 00	6109 00
11	6/4	R-18	1826	✓		900 00	5209 00	6109 00
12	6/11	S-22	1864	✓	1092 00		6301 00	5209 00
13	6/14	R-18	1780	✓		1887 00	4414 00	6301 00
14	6/14	R-18	1825	✓		1430 00	2984 00	4414 00
15	6/18	S-23	1900	✓	2000 00		4984 00	2984 00
16	6/20	R-19	1828	✓		1892 00	3092 00	4984 00
17	6/25	S-24	1922 ^{Scott}	✓	1848 00		4940 00	3092 00
18	6/30	S-25	1962 ^{Scott}	✓	715 00		5655 00	4940 00
19	7/9	S-27	1994 ^{Scott}	✓	741 00		6396 00	5655 00
20	7/13	R-22	1900	✓		2000 00	4396 00	6396 00
21	7/13	R-22	1864	✓		1092 00	3304 00	4396 00
22	7/23	S-29	2034 ^{Scott}	✓	741 00		4045 00	3304 00
23	7/27	R-24	1922 62	✓		2563 00	1488 00	4045 00
24	8/8	R-25	1994 ^{Scott}	✓		741 00	741 00	1488 00
25	9/18	S-38	2302 ^{Second Hand}	✓	285 00		1026 00	741 00

BALANCE									
1	9/12	R-38	2303	✓	1430		2456	00	1 026 00
2	9/25	R-31	2302	✓		285 00	2171	00	2 456 00
3	9/30	S-40	2367	✓	715 00		2886	00	2 171 00
4	10/19	R-35	2367-2303	✓		2145 00	741	00	2 886 00
5	11/14	S-46	2496 ^{Scot}	✓	1545 00		2286	00	741 00
6	11/19	S-47	2518	✓	715 00		3001	00	2 286 00
7	12/27	R-41	2496 ^{Scot}	✓	559 00	1545 00	1456	00	3 001 00
8					1980				
9	1/4/20	R-1	2518	✓		7150 00	741	00	1456 00
10	1/9	S-1	2617 ^{Scot}	✓	741 00		1482	00	741 00
11	1/14	R-2	2635 ^{Scot}	✓	2464 00		3946	00	1482 00
12	1/22	S-2	2657 ^{Scot}	✓	1320 00		5266	00	3946 00
13	1/28	R-2	2635	✓		2464 00	2802	00	5266 00
14	1/28	S-3	2675	✓	1430 00		4232	00	2802 00
15	1/30	R-3	2657	✓		1320 00	2912	00	4232 00
16	2/19	R-5	2617	✓		741 00	2171	00	2912 00
17	2/28	R-7	2675	✓		1430 00	741 00		2171 00
18	6/17	S-16	3046 ^{Scot}	✓	875 00		1616	00	741 00
19	6/20	R-19	3046	✓		875 00	741 00		1616 00
20	6/23	S-17	3063 ^{Scot}	✓	18593 75	✓	19,534 75		741 00
21	6/30	S-18	3076 ^{Scot}	✓	800 00		20,134 75		19,384 75
22	6/30	S-18	3077 ^{Scot}	✓	29531 25	✓	49,666 00		20,134 75
23	7/15	R-22	3076	✓		800 00	48,866	00	49,666 00
24	7/14	S-19	3106 ^{Scot}	✓	800 00		49,666	00	48,866 00
25	7/14	S-19	3107 ^{Scot}	✓	3178 75	✓	8,384 75		49,666 00

SCOTT

January 22, 1992

Ms. Martha Wilke Murray
Peterson Consulting
One Liberty Place
1650 Market Street, Suite 3400
Philadelphia, PA 19103

RE: Jonas Sewell Transfer Station Allocation

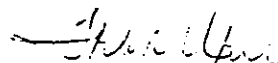
Dear Ms. Murray:

Please be advised that Scott Paper Company will not be submitting a statement about the Preliminary Cost Allocation Report relative to the above-referenced matter.

CERTIFICATION

Scott Paper Company has reviewed the Report and to the best of its knowledge, no documents exist which were not previously disclosed to the Allocation Consultant that are inconsistent with the assumptions relied upon by the allocation consultant in its proposed allocation. The scope of this certification covers the time period during which Marvin Jonas operated the Transfer Station and includes, to the best of Scott Paper Company's knowledge, information regarding any transactions between Scott Paper Company and any other transporter or other entity.

Sincerely,



Fran Urso
Paralegal

cc: N. J. DeBenedictis, Esquire
J. F. Lych, Jr., Esquire

FIRST

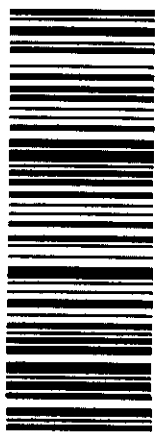
CLASS

FIRST

CLASS

FIRST

CERTIFIED MAIL

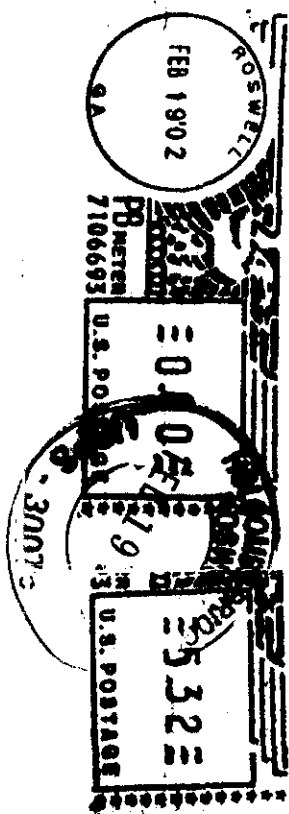


7001 0360 0003 3986 2642

19

 **Kimberly-Clark**

1400 Holcomb Bridge Rd.
Roswell, GA 30076



MAIL

FEB 28 1992

 **Kimberly-Clark**

Gwyneth 2001 Legat

From: 1400 Holcomb Bridge Road
Roswell, GA 30076

KC23282

*Ms. Kristine Matzko (34523)
Remedial Prog. Mgr.
US EPA
1650 Arch St.
Philadelphia, PA
19103*

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST

CLASS

FIRST